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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AMY VILELA, an individual;
JOZETTE FIGUEREDO, an individual;
AMY VILELA, as Special Administrator of the
Estate of SHALYNNE RAMOS,

Plaintiffs,

vs.

VALLEY HEALTH SYSTEM, LLC, d/b/a
CENTENNIAL HILLS HOSPITAL
MEDICAL CENTER, a Delaware Limited
Liability Company;
UNIVERSAL HEALTH SERVICES, INC., a
Delaware corporation; VALLEY HOSPITAL
MEDICAL CENTER, INC., a Nevada
Corporation; EMCARE, INC., a Delaware
Corporation; Tanya Netz PAC; Jill Mcatee, RN;
DOE Defendants I through X, inclusive; ROE
NURSES I through XX, inclusive; ZOE
HOSPITALS or OTHER MEDICAL
FACILITIES I through X; and ROE
CORPORATIONS I through X, inclusive.

Defendants.

Case No.: 2:16-cv-01503

**STIPULATION AND PROPOSED ORDER
TO EXTEND DUE DATES FOR
PLAINTIFFS' OPPOSITIONS TO
DEFENDANTS' VALLEY HEALTH
SYSTEM, LLC, D/B/A CENTENNIAL
HILLS HOSPITAL AND MEDICAL
CENTER'S AND TANYA NETZ PAC'S
AND EMCARE'S RENEWED MOTIONS
FOR PARTIAL SUMMARY JUDGMENT**

FIRST REQUEST

Plaintiffs, by and through their attorney of record, Casey D. Gish, Esq. of The Law Office of Casey D. Gish and Defendant, VALLEY HEALTH SYSTEM, LLC, dba CENTENNIAL HILLS HOSPITAL MEDICAL CENTER, by and through their attorney of record, Casey W. Tyler, Esq. of Hall Prangle & Schoonveld, and Defendant, TANYA NETZ, PAC, by and through

her attorney of record, Todd Weiss, Esq. of John H. Cotton and Associates, hereby stipulate as follows:

(1) The due date for Plaintiffs' Oppositions to Defendants, VALLEY HEALTH SYSTEM, LLC dba CENTENNIAL HILLS HOSPITAL MEDICAL CENTER and JILL MCATEE's Renewed Motion for Summary Judgment on Plaintiffs' EMTALA Claim (Doc. No. 93) and Renewed Motion for Partial Summary Judgment on Plaintiffs' Jozette Figuerdo and Josiah McKinney claims (Doc. No. 95) and Motion for Partial Summary Judgment to Limit Plaintiffs' Hedonic Damage Claim to the \$350,000 Non-Economic Damage Cap Per NRS 41A.035 (Doc. No. 94) was April 10, 2020.

(2) The parties agreed that the due date for the Opposition to the Renewed Motion for Partial Summary Judgment (Doc. No. 93) should be extended to Tuesday, April 14, 2020 and the due date for the Oppositions to the Renewed Motion for Partial Summary Judgment on Plaintiffs' Jozette Figuerdo and Josiah McKinney claims (Doc. No. 95) and Motion for Partial Summary Judgment to Limit Plaintiffs' Hedonic Damage Claim to the \$350,000 Non-Economic Damage Cap Per NRS 41A.035 (Doc. No. 94) and the Joinders thereto should be extended to Friday, April 17, 2020.

(3) No parties will be prejudiced by this short extension. There is no pending trial date in this matter.

IT IS SO STIPULATED.

Dated this 14th day of April, 2020

/s/ *Casey D. Gish*

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Co-counsel for Plaintiffs

Dated this 14th day of April, 2020

/s/ *Craig D. Slater*

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Dated this 14th day of April, 2020

/s/ *Casey W. Tyler*

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*Attorney for Defendant Valley Health
System, LLC*

Dated this 14th day of April, 2020

/s/ *Todd Weiss*

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*Attorneys for Defendant Tanya Netz, PAC and
Emcare, Inc.*

ORDER

Pursuant to the terms of the foregoing stipulation, the Court orders as follows:

1. Good cause exists for the extension of the due date for Plaintiffs' Oppositions to Defendants, VALLEY HEALTH SYSTEM, LLC dba CENTENNIAL HILLS HOSPITAL MEDICAL CENTER and JILL MCATEE's Renewed Motion for Summary Judgment on Plaintiffs' EMTALA Claim (Doc. No. 93) and Renewed Motion for Partial Summary Judgement on Plaintiffs' Jozette Figuero and Josiah McKinney claims (Doc. No. 95) and Motion for Partial Summary Judgement to Limit Plaintiffs' Hedonic Damage Claim to the \$350,000 Non-Economic Damage Cap Per NRS 41A.035 (Doc. No. 94) and the Joinders thereto.
2. The due date for the Oppositions are extended to April 14, 2020 for Defendants, VALLEY HEALTH SYSTEM, LLC dba CENTENNIAL HILLS HOSPITAL MEDICAL CENTER and JILL MCATEE's Renewed Motion for Summary Judgment on Plaintiffs' EMTALA Claim (Doc. No. 93) and to April 17, 2020 for both the Renewed Motion for Partial Summary Judgement on Plaintiffs' Jozette Figuero and

Josiah McKinney claims (Doc. No. 95) and the Motion for Partial Summary
Judgement to Limit Plaintiffs' Hedonic Damage Claim to the \$350,000 Non-Economic
Damage Cap Per NRS 41A.035 (Doc. No. 94) and any Joinders thereto.

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 15th day of April, 2020.

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CERTIFICATE OF SERVICE

I, Casey D. Gish, declare:

I am a resident of and employed in Clark County, Nevada. I am over the age of eighteen (18) years and not a party to the action within. My business address is 5940 S. Rainbow Blvd., Las Vegas, Nevada 89118.

I attest that I served the document described as **STIPULATION AND PROPOSED ORDER TO EXTEND DUE DATES FOR PLAINTIFFS' OPPOSITIONS TO DEFENDANTS' VALLEY HEALTH SYSTEM, LLC, D/B/A CENTENNIAL HILLS HOSPITAL AND MEDICAL CENTER'S AND TANYA NETZ PAC'S AND EMCARE'S RENEWED MOTIONS FOR PARTIAL SUMMARY JUDGMENT** on those parties/attorneys whose address appears below:

 X VIA ELECTRONIC SERVICE: in accordance with FRCP 5 through the CM/ECF electronic filing system. I am "readily familiar" with the firm's practice of electronically serving documents.

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9 Executed on the 14th day of April, 2020.

/s/ Casey D. Gish

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